To: Coffman, Joel[Coffman.Joel@epa.gov]

Cc: Albright, David[Albright.David@epa.gov]; Engelman, Alexa[ENGELMAN.ALEXA@EPA.GOV];

Moffatt, Brett[Moffatt.Brett@epa.gov]; Dermer, Michele[Dermer.Michele@epa.gov]; Salera, Jerry@DOC[Jerry.Salera@conservation.ca.gov]; Adam Rogge[arogge@camsops.com]; Joe Selgrath[selgrath@envirotechteam.com]; Gary Brierley[gbrierley@envirotechteam.com]

From: Matt Stikes

Sent: Thur 6/2/2016 9:55:32 PM **Subject:** Re: Live Oak Class I

Joel,

Thank you for the response regarding WCAC power plant water disposal wells. Unfortunately, I can only speak on behalf of the WCAC operated wells which include Chalk Cliff, Badger Creek, McKittrick, and Live Oak (rows 2-5). Our understanding was that only Badger Creek and Live Oak were required to switch to Class I as they have stopped supplying steam to their associated oil field. Chalk Cliff and McKittrick plants are still delivering steam as was their initial design.

WCAC would be glad to participate in a possible EPA meeting with other operators in the same situation. I'd recommend Jerry Salera with DOGGR who could provide a thorough list of other cogen operators with Class II wells.

As far as a possible conference call we are available on June 8-9 to discuss details of Badger Creek and Live Oak. As far as a group meeting is concerned, sometime after June 20th would work for us.

Thanks for your help and consideration.

Best regards,

Matt Stikes, PG EnviroTech Consultants, Inc. 5400 Rosedale Highway Bakersfield, CA 93308 (661) 377-0073 ext. 18 (661) 304-2300 Mobile

From: "Coffman, Joel" < Coffman.Joel@epa.gov>

To: Matt Stikes <mwsclimbs@yahoo.com>

Cc: "Albright, David" <Albright.David@epa.gov>; "Engelman, Alexa" <ENGELMAN.ALEXA@EPA.GOV>; "Moffatt, Brett" <Moffatt.Brett@epa.gov>; "Dermer, Michele" <Dermer.Michele@epa.gov>; "Salera,

Jerry@DOC" <Jerry.Salera@conservation.ca.gov>

Sent: Wednesday, June 1, 2016 7:28 AM

Subject: RE: Live Oak Class I

Matt:

Below is a list provided to us by the California Division of Oil, Gas and Geothermal Resources (CDOGGR) of potential Permitted Class II injection wells that they believe need to be permitted by US EPA as Class I Non Hazardous (NH) underground injection control (UIC) wells:

| District County Field | | Area | Operator | API# | |
|----------------------------|----------------------|------|------------------------------|-----------------|--------|
| Lease Name Comment | Well # Inj Typ | е | Injection Zone Wate | er Zone TDS | |
| Inland Kern Cantleberry | Jasmin C-1-22 WD | Any | Banks Energy, Inc. Vedder | 02952207 765 | Co-gen |
| well. I his well is | inside the productiv | /e | | | |

boundaries but may need an AE after a project-

by-project review.

Inland Kern Midway-Sunset Any Chalk Cliff Limited 02985813 WD-2 **Tulare Monarch** WD 21,900 Co-gen WD well Inland Kern Kern Front Any Badger Creek Ltd. 02986511 WD-1 WD Santa Margarita 1,500 Co-gen WD well. This well injects into the Santa

Margarita, which is one of the 11 Historically

Treated as Exempt (HTE) Aquifers.

| Inland 0298766 | | McKittrick n WD well | Main WD-1 | McKittrick Limited WD | | ene/Stevens | 10,600 | | |
|--------------------------------------|---------------|-------------------------|----------------|-----------------------------------|-------|-----------------------|--------------------------|--|--|
| Inland WD well | Kern | Kern River WD-1 WD | Any | Live Oak Limited Santa Margari | | 02989421 10,900 | Co-gen | | |
| Vedder/Famoso | | | | | | | | | |
| Inland A 61 WD Wel Coast LI | | Coles Levee, Nth /F | Any Stevens | Crestwood West | 36985 | 02901367 Industria | Coles Levee I Process | | |
| Inland A 83 WD Wel Coast LI | | Coles Levee, Nth /F | Any Stevens | Crestwood West | 36985 | 02915283 Industria | Coles Levee I Process | | |
| Inland A 62 | Kern -32 W | Coles Levee, Nth | Any Stevens | Crestwood West | 36985 | 02958208 Industria | Coles Levee I Process | | |

WD Well Coast LLC

Our questions:

How many of the above listed wells are owned and operated by your clients?

Are there wells listed on the above list that are not owned and operated by your clients? If so, please name them.

Are there wells owned and operated by your clients that you believe need to be permitted as EPA Class I NH UIC wells that are not on the above list, and if so, can you please list them for us.

We will need to have a meeting with the owners/operators of the wells in need of EPA Class 1 NH UIC wells in the very near future so we can discuss the permitting of these wells.

Please reply and, if possible provide names of the owners/operators and potential meeting dates

If you have any questions, call anytime. Thanks,

Joel Coffman <u>Groundwater UIC Office</u> P.G./Physical Scientist 415.972.3530

U.S. EPA Region 9 | 75 Hawthorne Street (WTR-3.2) | San Francisco, CA 94105

From: Matt Stikes [mailto:mwsclimbs@yahoo.com]

Sent: Tuesday, May 31, 2016 9:57 AM

To: Coffman, Joel <Coffman.Joel@epa.gov>

Cc: Adam Rogge <arogge@camsops.com>; Gary Brierley <gbrierley@envirotechteam.com>;

Joe Selgrath <selgrath@envirotechteam.com>

Subject: Live Oak Class I

Joel.

One of the other WCAC power plants that used to steam share is their Live Oak facility in the Kern River oil field. The Live Oak disposal well is located in section 18, T28S-R28E, MDB&M, API No. 029-89421. This was constructed at roughly the same time as Badger Creek, and the basal sand, the Famosa had a swab sample that resulted in 10,900 mg/L TDS. This well is similar in that it is much deeper than the surrounding oil producing wells, see AOR map attachment.

DOGGR had reviewed the zones of all Kern River injection projects and the Live Oak project was required to drop the Santa Margarita and Olcese zones and leave only the

Vedder and Famosa zones. The Famosa is the only zone that has been used for injection - the zones in question were to be dropped from the Project Approval Letter.

Also at that time, DOGGR had requested other UIC project data that was missing from the file including a 1/4 mile AOR with casing diagrams, see cover letter attachment. This well is similar to Badger Creek well in that no wells penetrate the injection zone within 1/4 mile.

Live Oak no longer shares steam with Chevron in the Kern River field and therefore must switch to Class I status. However, in this case there is not an approaching deadline as with Badger Creek. We still would like to see this processed in a timely manner.

Let me know of a good time for a conference call when we can discuss these issues...

I'll be getting a dropbox setup shortly to share the Class II project files for both Badger Creek and Live Oak.

Thanks,

Matt Stikes, PG EnviroTech Consultants, Inc. 5400 Rosedale Highway Bakersfield, CA 93308 (661) 377-0073 ext. 18 (661) 304-2300 Mobile